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10 Attorneys for Defendant sued as
11 GEORGE DIKIAN

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 VPN.COM LLC,

15 Plaintiff(s),

16 v.

17 GEORGE DIKIAN, et al.,

18 Defendant(s).

Case No.: 2:22-cv-04453-AB-MAR

**DECLARATION OF MICHAEL
RODENBAUGH IN SUPPORT OF
PLAINTIFF'S APPLICATION FOR
LEAVE TO FILE DOCUMENTS
UNDER SEAL**

Judge: Honorable Andre Birotte Jr.
Courtroom: 7B

21 I, Michael Rodenbaugh, do hereby declare as follows:

22 1. I am the owner and managing attorney at Rodenbaugh Law, lead counsel of record
23 for Defendant sued as George Dikian in this matter. I am licensed to practice in the State of
24 California, and I am admitted to practice before the U.S. District Court for the Central District of
25 California.

26 2. I am familiar with the facts set forth herein, and, if called as a witness, I could and
27 would testify competently to those facts under oath. I submit this declaration in support of Plaintiff
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1 VPN.COM LLC's Application for Leave to file portions of Plaintiff's Memorandum of Points and
2 Authorities in Support of Motion to Modify the Scheduling Order and the Declaration of Michael D.
3 Cilento, Esq., in Support of the Motion to Modify the Scheduling Order under seal, pursuant to
4 Local Rule 7-11 and 79.

5 3. In the Plaintiff's Motion to Modify the Scheduling Order, the Memorandum of
6 Points and Authorities, and the Declaration of Michael D. Cilento, Esq., in Support of the Motion to
7 Modify the Scheduling Order, the materials redacted from Defendant's deposition transcript is
8 highly confidential financial security information, physical address and familial information.

9 4. Public disclosure of the confidential information would contravene the Defendant's
10 long-established efforts to protect his family and his financial security practices through
11 pseudonymity. Competitors, potential illegal hackers, and other ill-wishing parties would gain an
12 unfair and illegitimate insight into Defendant's family and business security information including
13 its location, accessibility, records, and layers of security thereupon. All without Plaintiff having
14 proved any material allegation against Defendant to date.

15 5. Using the knowledge of the Defendant's familial information and levels of security,
16 third-parties would be able to exploit such confidential information and potentially infiltrate into the
17 Defendant's private life and business records or emails. There is no legitimate public interest in
18 public disclosure of information that compromises business assets which generate economic value,
19 and risks Defendant's and his family's safety and security.

20 6. The location and home address of the Defendant's son, a non-party, is confidential
21 information that any reasonable person would likely consider to be private and important to be kept
22 as confidential rather than it be publicly disclosed in connection with Plaintiff's unsupported, ill-
23 advised and misguided fraud complaint. There is no legitimate public interest in revealing this
24 information in this action, without Plaintiff having proved any material allegations against
25 Defendant to date, nor has Plaintiff even alleged any potential misconduct of Defendant's son.

26 7. The portions of Defendant's deposition transcript that have been designated as
27 confidential were discussed at length between the counsel for both Parties, and were carefully
28 selected in effort to avoid unnecessary redactions.

1 I declare under penalty of perjury of the laws of the United States of America that the
2 foregoing is true and correct to the best of my knowledge and belief.

3 Executed on September 25, 2023.

4 By: /s/ Mike Rodenbaugh
5 Mike L. Rodenbaugh (SBN 179059)
6 RODENBAUGH LAW

7 *Attorneys for Defendant*
8 *Sued as George Dikian*

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United States District Court
Northern District of California